

Zbigniew Szandera

Full name(s)

1311 W. 75th Court # G

Street address or postal box number

Indianapolis IN 46260

City, State and zip code

(317) 222-6062

Phone Number

FILED

JUN 02 2014

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

Civil Action No. **1:14-cv-0889 WTL-TAB**
(To be supplied by the Court)

Zbigniew Szandera

Plaintiff(s)

Full name(s) (Do not use *et al.*)

v. AAR Aircraft Services

Defendant(s).

Full name(s) (Do not use *et al.*)

CIVIL RIGHTS COMPLAINT

A. PARTIES

1. I, Zbigniew Szandera, am a citizen of USA - Indiana
(Plaintiff name(s)) (State)

and presently reside at 1311 W. 75th Court # G, Indianapolis IN 46260
(mailing address)

2. Defendant AAR Aircraft Services is a citizen of Indiana - USA
(name of first defendant) (State)

whose address is 2825 Perimeter Rd, Indianapolis IN 46241.

3. Defendant _____ is a citizen of _____
(name of second defendant) (State)

whose address is _____.

(If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "A. PARTIES." Be sure to include each defendant's complete address and title.)

B. JURISDICTION

1. This cause of action is brought pursuant to 28 U.S.C. § 1331

2. _____ Jurisdiction also invoked pursuant to 28 U.S.C. § 1331. (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

C. NATURE OF THE CASE

BRIEFLY state the background of your case.

I believe I have been discriminated against in
violation of the Americans With Disabilities
Act, as amended.
"Wrongfully terminated"

May 28, 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA

" D. CAUSE OF ACTION"

Claim 1: I was hired to AAR Aircraft Service Indianapolis IN in December 2010 and wrongfully terminated because of a disability I received an on-the-job injury and known medical conditions in October 19, 2012.

Supporting Facts: According to my claim I received on-the-job injury on March 9, 2012 for which employer accommodated me with light duty. On October 15, 2012 the

Doctor John McLimore from OrthoIndy Indianapolis IN, discharge me from his care with permanent restrictions. Then employer Called me (Carmen Meyer) and told

" If I don't bring from Doctor a full release without restrictions then employer fire me." My employer (HR Supervisor, Heather Van Gorp) knowing that I had undergone surgery

and had a record permanent restrictions due to the on-the-job injury, terminated me on October 19, 2012 and deny all medical benefits.

I believe I have been discriminated against in violation of the Americans With Disabilities Act, as amended.

Zbigniew Sztandera
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D. CAUSE OF ACTION

I allege that the following of my constitutional rights, privileges, or immunities have been violated and that the following facts form the basis of my allegations: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "D. CAUSE OF ACTION.")

Claim I: _____

Supporting Facts: (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

[illegible]

Claim II: _____

Supporting Facts:

Claim III: _____

Supporting Facts:

E. PREVIOUS LAWSUITS

Have you been or are you now a party to any other lawsuit(s) in state or federal court dealing with the same facts involved in this action? ____ Yes ☒ No.

If your answer is "Yes," describe each lawsuit. (If there is more than one lawsuit, describe the additional

lawsuits using this same format on a blank sheet which you should label "E. PREVIOUS LAWSUITS.")

a. Parties to previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

b. Name and location of court and docket number _____

c. Disposition of lawsuit. (For example, was the case dismissed? Was it appealed?
Is it still pending?) _____

d. Issues raised: _____

e. Approximate date of filing lawsuit: _____

f. Approximate date of disposition: _____

F. REQUEST FOR RELIEF

I request the following relief:

Original signature of attorney (if any)

Plaintiff's Original Signature

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is **true and correct**.

Executed at _____ on _____.
(location) (date)

Plaintiff's Original Signature

I request the Court's assistance in serving process on the defendant(s). _____ Yes _____ No

Plaintiff demands a trial by jury. _____ Yes _____ No